

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

PARAGON COMPONENT SYSTEMS, LLC,

Plaintiff,

Case No. 3:25-cv-00170-wmc

V.

QUALTIM, INC., CENTER FOR BUILDING
INNOVATION, LLC, DRJ
ENGINEERING, LLC, INSPIRED PURSUITS,
LLC, KIRK GRUNDAHL, and SUZANNE
GRUNDAHL,

Defendants.

**DECLARATION OF JAMES HOLLAND IN SUPPORT OF PARAGON'S
MOTION TO DETERMINE WHETHER EXHIBITS TO COMPLAINT SHOULD BE
SEALED**

I, James Holland, hereby declare:

1. I am employed by Clearspan Components, Inc. ("Clearspan"). I am an adult over the age of 21 and am competent to make this declaration. This declaration is based on my personal knowledge, including my knowledge of documents and information belonging to Clearspan.

2. On March 25, 2024, Suzanne Grundahl sent Rob Eason and me an email, which forwarded an earlier email with the subject line "Paragon-Clearspan-Qual m-Truss Pal Business Roadmap Follow-up," to which a Microsoft Word file titled "Paragon-Clearspan-Qual m Truss Pal IP-TS Roadmap.240325 Final DraJ.docx" was attached. An authentic copy of this email and its attachment is attached as an exhibit to the Declaration of Rob Eason. I reviewed the Microsoft Word document attached to the

March 25, 2024 email and compared it to Document 1-8 in this action, and the two documents appear to be the same.

3. I understand that Defendants contend that Paragon and its employees signed a non-disclosure agreement at a meeting with Defendants in August 2023. I did not attend such meeting, and I did not sign the related non-disclosure agreement referenced by Defendants.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on the 18th day of March 2025 within the United States.

s/ James Holland

Mr. James Holland

A handwritten signature in black ink, appearing to read "James Holland", written over a horizontal line.